

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.) CRIMINAL ACTION NO. 05-30002-MAP
)
FRANK DEPERGOLA)

MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant, through counsel, and requests this Honorable Court to modify his conditions of release to allow him to bring his children to a family birthday party in Suffield, CT on Saturday, January 28, 2006 between the hours of 12:00 p.m. and 4:00 p.m.

The Defendant
By: _____
Michael L. Foy, Esquire
935 Main Street
Springfield, MA 01103
(413) 781-1106
BBO#176920

CERTIFICATE OF SERVICE

I, Michael L. Foy, do hereby certify that I have on this date mailed a copy of the foregoing document to Assistant United States Attorney Ariane D. Vuono, at the United States District Court, 1550 Main Street, Springfield, MA 01103.

Date: Jan 20, 2006

Michael L. Foy, Esquire